

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TZVI WEISS, LEIB WEISS, MALKA WEISS, :
YITZCHK WEISS, YERUCHAIM WEISS, and :
ESTHER DEUTSCH, :
Plaintiffs, : CV 05-4622 (CPS)
: :
- against - :
NATIONAL WESTMINSTER BANK PLC, : DECLARATION OF
: LAWRENCE B. FRIEDMAN
Defendant. :
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Lawrence B. Friedman declares as follows:

1. I am a member of the Bars of the State of New York and of this Court and of the law firm of Cleary Gottlieb Steen & Hamilton LLP, attorneys for defendant National Westminster Bank Plc (“NatWest”) in the above-captioned matter. I make this declaration in support of NatWest’s motion to dismiss plaintiffs’ complaint.

2. Attached as Exhibit A is a true and correct copy of the Holy Land Foundation Indictment, filed July 26, 2004.

3. Attached as Exhibit B is a true and correct copy of Julian Borger, Close Trust, Israel Pleads; Britain is being asked to clamp down on Palestinian fundraisers, The Guardian, dated August 7, 1997.

4. Attached as Exhibit C is a true and correct copy of the U.K. Charity Commission Report, dated September 24, 2003.

5. Attached as Exhibit D is a true and correct copy of an extract from the U.K. Charity Commission Annual Report of 1996.

6. Attached as Exhibit E is a true and correct copy of Jeevan Vasagar, 'Hamas-linked' relief funds frozen – British Muslims furious over charity commission's decision to follow US in closing accounts of the UK-based Interpal, The Guardian, dated August 28, 2003.

7. Attached as Exhibit F is a true and correct copy of the U.K. Charity Commission Order freezing Interpal's accounts held at NatWest, dated August 26, 2003.

8. Attached as Exhibit G is a true and correct copy of the U.K. Charity Commission Order unfreezing Interpal's accounts held at NatWest, dated September 24, 2003.

9. Attached as Exhibit H is a true and correct copy of Steve McGonigle, Israel bans Richardson foundation[,] Muslim group denies ties to Hamas militants, The Dallas Morning News, dated June 21, 1997.

10. Attached as Exhibit I is a true and correct copy of Executive Order No. 13224 published at 66 Federal Registrar 49,079 on September 25, 2001.

11. Attached as Exhibit J is a true and correct copy of The Federal Reserve Board Structure Data Report For U.S. Offices Of Foreign Banks, as of June 30, 2005.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Lawrence B. Friedman
Lawrence B. Friedman

Dated: December 19, 2005
New York, New York